

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY)
PARTNERS, COUNTRY MUSIC)
TELEVISION, INC., PARAMOUNT)
PICTURES CORPORATION, and BLACK)
ENTERTAINMENT TELEVISION LLC,)

Plaintiffs,) Case No. 1

vs.) 07CV02103

YOUTUBE, INC., YOUTUBE, LLC,)
and GOOGLE, INC.,)

Defendants.)

THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.,)
on behalf of themselves and all)
others similarly situated,)

Plaintiffs,) Case No. 2

vs.) 07CV3582

YOUTUBE, INC., YOUTUBE, LLC, and)
GOOGLE, INC.,)

Defendants.)

DEPOSITION OF DAVID EUN
NEW YORK, NEW YORK
THURSDAY, AUGUST 7, 2008

REPORTED BY:
ERICA RUGGIERI, CSR, RPR
JOB NO. 15377

Figueira Decl. Tab

26

1 D. EUN

26-0002

2 A. Yes.

3 So to be clear, we did do
4 proactive screening of copyright, from
5 what it says here. So -- you had asked me
6 about that earlier, but. I mean I wasn't
7 involved with this, but we obviously did.

8 Q. Okay. So the existing policy at
9 the time of this draft document was a zero
10 tolerance on copyright as well as porn,
11 violence and hate. And that was enforced
12 with proactive screening before the video
13 went live, correct?

14 A. Yeah. I have no reason to
15 dispute that what this is is the current
16 policy was not, you know, was not anything
17 but the current policy back then.

18 Q. Okay. And the proposal is to
19 keep rejecting full works -- to keep
20 rejecting all porn, violence and hate, but
21 to accept partial works up to ten minutes
22 long and respond to take-down requests,
23 correct?

24 A. That's what it says, yes.

25 Q. And was that proposal ever